UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOSEPHINE JAMES EDWARDS, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No. 15-cv-09279

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

NOTICE OF RELATED ACTION

Suzanne Boelter, by and through her attorneys, hereby notifies this Court of an essentially identical action currently pending before the Honorable Analisa Torres, *Boelter v. Hearst Communications, Inc.*, 15-cv-03934-AT (S.D.N.Y.). The Civil Cover Sheet in this action, Doc. No. 2, incorrectly noted that an essentially identical action had not been filed in this District at any time. However, the complaint in *Boelter v. Hearst*, which contains substantially identical allegations against the same defendant for claims pursuant to the Michigan Video Rental Privacy Act, M.C.L. §§ 445.1711, *et seq.* and for unjust enrichment, was filed on May 21, 2015.

Dated: November 25, 2015

Respectfully submitted,

By: /s/ Joseph I. Marchese
Joseph I. Marchese

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